

**IN THE UNITED STATES BANKRUPTCY COURT
FOR EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Theodore A. Green
Debtor

Carrington Mortgage Services, LLC as
servicer for Elizon Master Participation
Trust I, U.S. Bank Trust National
Association, as Owner Trustee
v.

Theodore A. Green
Scott F. Waterman - Trustee
Respondents

CASE NO.: 20-12303-amc

CHAPTER 13

Judge: Ashely M. Chan

**MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO TRUSTEE'S
NOTICE OF FINAL CURE PAYMENT WITH CONSENT**

Secured Creditor, Carrington Mortgage Services, LLC as servicer for Elizon Master Participation Trust I, U.S. Bank Trust National Association, as Owner Trustee (on behalf of itself and together with any successor and/or assign, "Movant") hereby moves this Court for an Order extending the time to file and serve its answer, pleadings, or motions in response to Trustee's Notice of Final Cure Payment. In support of this Motion, Movant respectfully states:

1. Trustee filed the Notice of Final Cure Payment on April 2, 2025. Docs 83.
2. The filing and service of Movant's answer, pleadings, or motions in response to Trustee's Notice of Final Cure Payment is due April 23, 2025.
3. Movant has not previously been granted an extension in this matter.
4. Movant's prescribed time period for filing and service of its answer, pleadings, or motions in response to Trustee's Notice of Final Cure Payment has not expired.

5. Movant needs additional time in order to review and prepare its response to Trustee's Notice of Final Cure Payment, as this loan was recently service transferred to Carrington Mortgage Services, LLC.

6. Movant has submitted a proposed order contemporaneously with the filing of this Motion.

7. Movant requests an extension of time to file an answer, pleading, or motions in response to Trustee's Notice of Final Cure Payment.

8. Movant requests an extension of time to file an answer, pleading, or motions in response to Trustee's Notice of Final Cure Payment to May 7, 2025.

9. Debtor's Counsel and the Trustee have consented to this request.

WHEREFORE, the Movant respectfully prays that this Court enter an Order enlarging their time for service of answers, pleadings, or motions in response to Trustee's Notice of Final Cure Payment up to and including May 7, 2025.

Dated: April 23, 2025

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